

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

DEBORAH A. MILLER,)	
)	
Plaintiff,)	
)	
v.)	Case No.
)	
EQUIFAX INFORMATION SERVICES)	
LLC; EXPERIAN INFORMATION)	
SOLUTIONS, INC., TRANS UNION LLC,)	
AND GE CAPITAL RETAIL BANK,)	
)	
Defendants.)	

NOTICE OF REMOVAL

Defendant, Equifax Information Services LLC (“Equifax”), by Counsel, hereby files this Notice of Removal of this action from the Court of Common Pleas of Allegheny County, Pennsylvania, wherein it is now pending as Case No. GD14-005120, to the United States District Court for the Western District of Pennsylvania. This Notice of Removal is filed pursuant to 28 U.S.C. §§ 1441 and 1446. In support hereof, Defendants show this Court as follows:

1. An action was filed on March 25, 2014 in the Court of Common Pleas of Allegheny County, Pennsylvania, entitled *Miller v. Equifax Information Services LLC, et al.* Case No. GD14-005120 (the “State Court Action”).
2. Equifax was served with the Complaint on April 1, 2014.
3. This Notice is being filed with this Court within thirty (30) days after Equifax was served with a copy of Plaintiff’s initial pleading setting forth the grounds for her action and her claims for relief.

4. This Court has original jurisdiction over this case pursuant to 28 U.S.C. § 1331, in that this is a civil action arising under the Constitution, laws or treaties of the United States; specifically 15 U.S.C. § 1681 *et seq.*, otherwise known as the Fair Credit Reporting Act (“FCRA”), as follows:

(a) Plaintiff’s Complaint, on its face, alleges a violation of the FCRA. (*See* Plaintiff’s Complaint, ¶¶ 72-76).

(b) The FCRA, pursuant to 15 U.S.C. § 1681(p), provides that any action alleging a violation of its provisions “may be brought in any appropriate United States district court without regard to the amount in controversy . . .”

5. Promptly after the filing of this Notice of Removal, Equifax shall give written notice of the removal to Plaintiff and to the Clerk of the Court of Common Pleas of Allegheny County, Pennsylvania, as required by 28 U.S.C. § 1446(d).

6. Attached hereto, as Exhibit A, is a true and correct copy of the Complaint served upon Equifax in the State Court Action.

WHEREFORE, Equifax requests that the above-described action be removed to this Court.

Respectfully submitted this 21st day of April, 2014.

EQUIFAX INFORMATION SERVICES LLC

A handwritten signature in black ink, appearing to read 'R.F. Brien', with a long horizontal stroke extending to the right.

REX F. BRIEN

PA ID No. 40884

Christie Pabarue and Young

1880 JFK Blvd., 10th Floor

Philadelphia, PA 19103

TEL: (215) 587-1609

FAX: (215) 587-1699

rfbrien@cpmy.com

CERTIFICATE OF SERVICE

This is to certify that I have this day electronically filed a true and correct copy of the foregoing NOTICE OF REMOVAL with the Clerk of the Court using the ECF system, which will send notification of such filing to the following:

Clayton S. Morrow
Morrow & Artim, PC
304 Ross Street
Mitchell Building, 7th Floor
Pittsburgh, PA 15219

John H. Goolsby
Goolsby Law Office, LLC
2701 University Ave. SE, Suite 209
Minneapolis, MN 55414
Attorneys for Plaintiff

Dated: April 21, 2014

A handwritten signature in black ink, appearing to read 'REB' followed by a long horizontal stroke.

REX F. BRIEN